



Los Angeles River and Ballona Creek Metals TMDL Comments

September 9, 2004

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Overall View

- ◆ Stakeholder involvement was good for the City of Los Angeles
- ◆ RWQCB staff seems open to reconsidering the implementation schedule
- ◆ Studies to refine the translator, WERs, and hardness data are needed
- ◆ Our knowledge of BMP performance is limited



TMDLs on Unlisted Waters

- ◆ Metal allocations for reaches with unlisted metal/reach combinations are not legal
- ◆ Tributary Rule applies to existing listings, but it doesn't force a TMDL on an unlisted reach.



TMDLs on Unlisted Waters [2]

◆ City's position

- ◆ We don't want to set a precedent of doing a TMDL on an unlisted Reach
- ◆ We don't want to delay cleanup of our waterbodies



TMDLs on Unlisted Waters [3]

- ◆ Recommended solution: remove all language and wasteload allocations related to unlisted metals. Save the original TMDL for use when the respective reaches are listed on the 303(d) list.
- ◆ Alternative solution: put language in the TMDL, allowing use of the wasteload allocations after the reaches are listed.



TMDLs on Unlisted Waters [4]

◆ Benefits:

- ◆ We will be able to continue our efforts to clean up the River by focusing on the listed metals
- ◆ There would be significant incidental cleanup of unlisted metals
- ◆ U.S. EPA will be in compliance with the 1998 Consent Decree



TMDLs on Unlisted Waters [5]

◆ Benefits:

- ◆ We would be able to use the original version of the TMDL (modified with new data and information)
- ◆ Our Region would not be setting a controversial precedent



Maximum Extent Practicable (MEP)

- ◆ CTR (California Toxic Rule) standards are not necessarily equivalent to MEP
 - ◆ Amount of storm a Best Management Practice (BMP) can treat is not always known
 - ◆ Load Capacity Curves provided in the TMDL infer the need to treat the whole storm, no matter how intense



Maximum Extent Practicable (MEP) [2]

◆ City's recommendations:

◆ Insert the quote into the TMDL:

“During the iterative implementation process the RWQCB will work with stakeholders to define MEP for each type of BMP, including the maximum amount of volume and storm intensity that can be handled by various BMP applications, taking into account cost as well as EIR-related considerations.”



Maximum Extent Practicable (MEP) [3]

- ◆ City's recommendations, continued:
 - ◆ Define the maximum storm intensity that can be treated (or work with us so we can define MEP on a site-specific basis)



Implementation Schedule

- ◆ City supports a reconsideration of the implementation schedule
- ◆ Recommendation: Allow 22 years for 100% compliance, based on justifications previously submitted
- ◆ Recommendation: make sure that reconsideration of the schedule is written into the TMDL



CEQA Analysis

- ◆ Consider POTW upgrades and siting a new POTW as options
- ◆ Include consideration of chemical addition, microfiltration, and reverse osmosis
- ◆ Discuss power usage and brine disposal
- ◆ Include land acquisition for BMPs



Dry Weather Critical Flow for Los Angeles River

- ◆ The 3 major POTWs are permitted to the total design flow of 169 cfs
- ◆ The critical flow at Wardlow Road for the calculation of targets is 145 cfs



Dry Weather Critical Flow [2]

- ◆ City's view:
 - ◆ We are currently permitted for the maximum design flow with associated concentration limits
 - ◆ It is protective to discharge at those limits and flows
 - ◆ The critical flow at Wardlow Road should allow for 169 cfs plus critical storm drain flow



Jurisdictional Groups for Los Angeles River

◆ City's Perspective

- ◆ Experience from SMBBB (Bacterial) TMDL
- ◆ 30 different municipalities

◆ Request:

- ◆ Have two jurisdictional groups responsible for implementing the TMDL
- ◆ Upper and Lower LA river, divided by Arroyo Seco



BMPs

- ◆ City supports the use of BMPs as the measure for compliance
- ◆ Stakeholders will need to work with RWQCB to provide assurances that standards will be met to the MEP



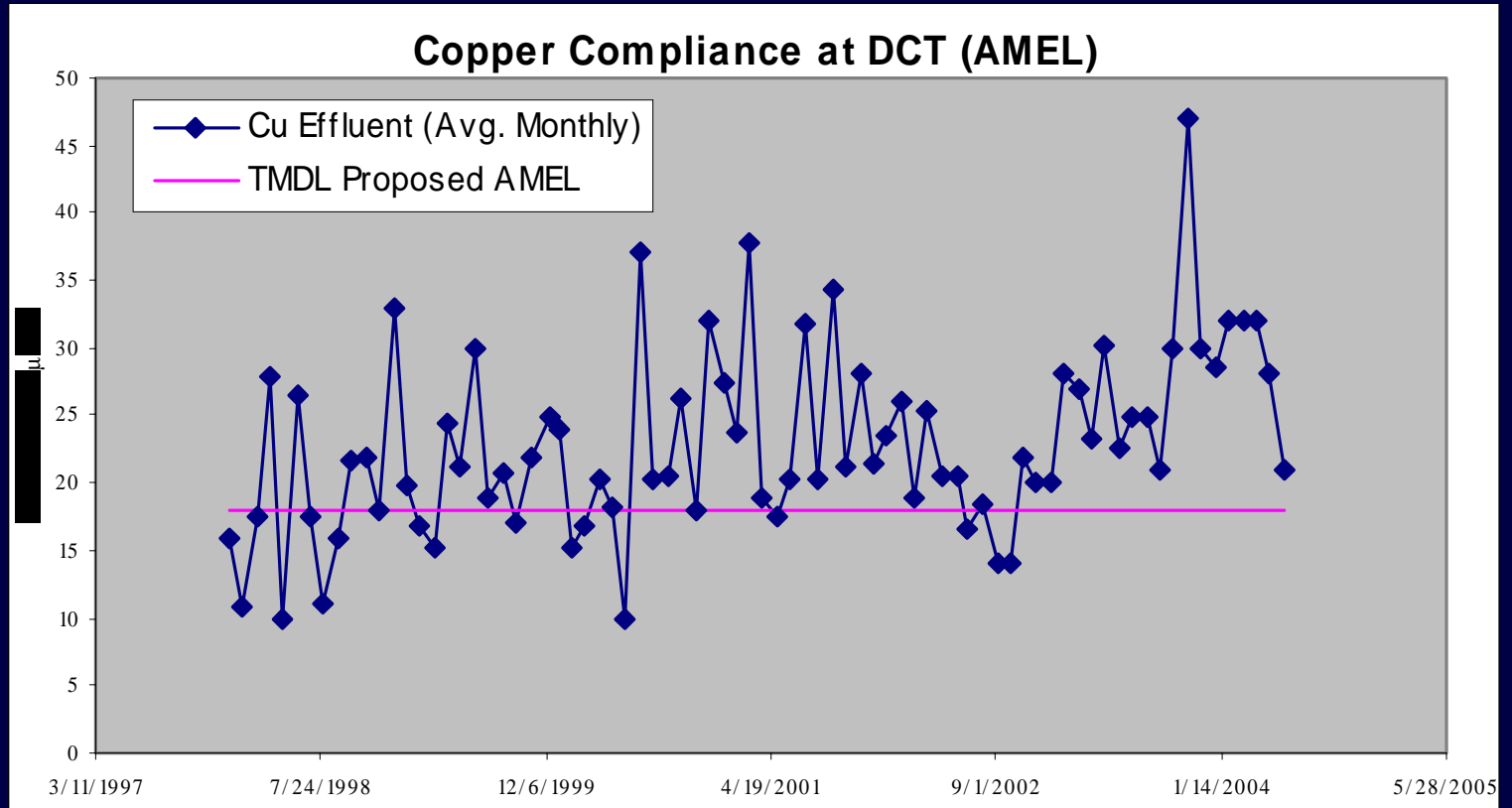
Measured Hardness (mg/L as CaCO₃)

Reach	# tests	10 th percentile	Median	90 th percentile
5 above DCT	40	608	702	832
4 below DCT	69	196	246	400
3 above LAG	17	232	282	330
3 Below LAG	69	242	278	322
2	83	221	268	322
1	82	219	282	340

Data was collected from POTWs and LACDPW.



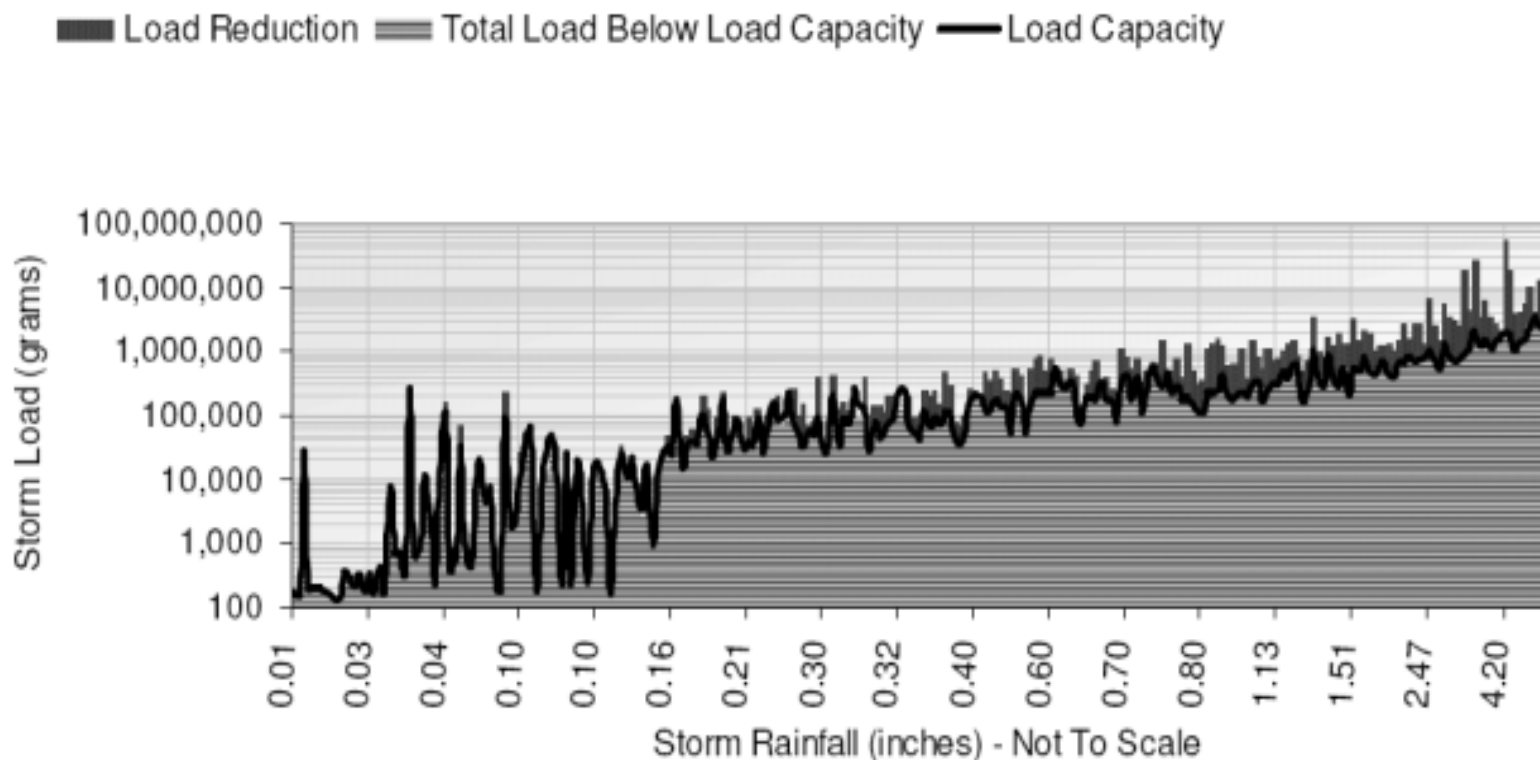
DCT Effluent Data for Copper



(AMEL = Average Monthly Effluent Limit)



Copper Load Capacity Curve for LA River



Computed Load Indicators:	Value	Units
Total Storms Over 12-Year Period	249	none
Total Below Load Capacity Curve:	70,590	kg
Total Existing Load (dots and dashes)	297,889	kg
Existing Load Below Load Capacity Curve (dashes):	69,706	kg
Existing Load Above Load Capacity Curve (dots):	228,183	kg
Estimated Load Reduction*:	76.6%	none